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BY EMAIL

July 11, 2008

Deborah Martin Norcross, Esq.
66 Marion Road West
Princeton, New Jersey 08540

Re: Jordan Mann v. Plus One Fitness et al.
07 CV 5691(RB)

Dear Deborah:

This letter is written in response to your July 7, 2008 letter. The numbers in this letter correspond to the numbered requests in your letter. Plaintiff objects to all these demands to the extent defendants seek to use the deficiency letter to obtain documents not originally sought in their document requests. Without waiving said objections, plaintiff responds as follows:

In response to your request for documents that pertain to plaintiff's employment in the last 10 years to the present, plaintiff directs you to the documents attached herein entitled "Massage Therapist Employment Agreement." She also directs your attention to the emails produced entitled Jordan Mann and Mann Jordan—emails 2, 3. They were produced on June 26 and July 1, 2008. Plaintiff did not work while in New Zealand and as such as no documentation of her working there. She has also produced authorizations for her taxes for 2006 and 2007. She has no other documentation of previous employment.

Attached is a document entitled "Mann, Acceptance Letter" that pertains to plaintiff's acceptance to study through New York University. Also find authorizations to doctors Retha Buck and Ann Boris as well as for Medicaid. Plaintiff is unable to locate the addresses of Ms. Huggins and Friedman.

Also is attached documentation of plaintiff's name change.

In regards to your May 9, 2008 deficiency letter, I refer you to the responses furnished in my May 16, 2006 letter.

Sincerely,

/s

NKEREUWEM UMOH

Cc: Harold Derschowitz, Esq., via email.